

**INTERROGATORY 77**

If your response to Request 20 is anything other than an unqualified admission, SPECIFY each DOCUMENT supporting your response.

**RESPONSE TO INTERROGATORY 77**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 78**

If your response to Request 20 is anything other than an unqualified admission, IDENTIFY each person with knowledge supportive of your response.

**RESPONSE TO INTERROGATORY 78**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**REQUEST 21**

Admit you have not RECORDED those occasions on which an EMPLOYEE missed a 10-minute net REST BREAK during the CLASS PERIOD as a result of YOU "fail[ing] to provide" such a break within the meaning of IWC Wage Order 7-2001, §12.

**RESPONSE TO REQUEST 21**

Polo specifically objects to the request on the grounds that it is argumentative and not relevant to any claim or defense and is not likely to lead to any admissible evidence, and on the grounds that it is vague and ambiguous as to the phrases "missed a 10-minute net REST BREAK" and "as a result of YOU 'fail[ing] to provide' such a break". Defendant specifically objects on the grounds that the request seeks a legal conclusion. Defendant further specifically objects that this request presumes that rest breaks were not provided or made available, and/or that they were not provided or made available for the full allowable amount of time under the law. Based on the foregoing, Defendant denies the request.

**INTERROGATORY 79**

If your response to Request 21 is anything other than an unqualified admission, state all facts on which your response is based.

**RESPONSE TO INTERROGATORY 79**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 80**

If your response to Request 21 is anything other than an unqualified admission, SPECIFY each DOCUMENT supporting your response.

**RESPONSE TO INTERROGATORY 80**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.

1 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
2 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
3 confer as necessary.

4 **INTERROGATORY 81**

5 If your response to Request 21 is anything other than an unqualified admission, IDENTIFY  
6 each person with knowledge supportive of your response.

7 **RESPONSE TO INTERROGATORY 81**

8 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number  
9 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has  
10 already answered at least three hundred and twenty three (323) interrogatories propounded by  
11 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.  
12 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
13 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
14 confer as necessary.

15 **REQUEST 22**

16 Admit that you did not take measures to ensure that staffing levels were sufficient for  
17 EMPLOYEES to be able to take REST BREAKS during the CLASS PERIOD.

18 **RESPONSE TO REQUEST 22**

19 Polo specifically objects to the request on the grounds that it is not relevant to any claim or  
20 defense and is not likely to lead to any admissible evidence, and on the grounds that it is vague and  
21 ambiguous as to the phrase "did not take measures to ensure". Subject to and without waiving the  
22 foregoing general and specific objections, and to the extent that Polo understands the request, Polo  
23 denies the request.

24 **INTERROGATORY 82**

25 If your response to Request 22 is anything other than an unqualified admission, describe in  
26 detail all measure you took to ensure that staffing levels were sufficient for EMPLOYEES to be able  
27 to take REST BREAKS during the CLASS PERIOD.

28

**RESPONSE TO INTERROGATORY 82**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 83**

If your response to Request 22 is anything other than an unqualified admission, SPECIFY each DOCUMENT supporting your response.

**RESPONSE TO INTERROGATORY 83**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**REQUEST 23**

Admit that, during the CLASS PERIOD, you relied on IWC Wage Order §3(D) to pay all California sales associates in your full-price stores as though they were exempt from the overtime provisions of IWC Wage Order §3(A)(1).

**RESPONSE TO REQUEST 23**

Polo specifically objects to the request on the grounds that it is vague and ambiguous as to the phrase "relied on" and "as though they were exempt from". Defendant further specifically objects on the grounds that the request seeks a legal conclusion. Based on the foregoing, Defendant lacks sufficient information to respond to this request and on that basis Defendant denies the request.



**INTERROGATORY 84**

If your response to Request 23 is anything other than an unqualified admission, state all facts on which your response is based.

**RESPONSE TO INTERROGATORY 84**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 85**

If your response to Request 23 is anything other than an unqualified admission, SPECIFY each DOCUMENT supporting your response.

**RESPONSE TO INTERROGATORY 85**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 86**

If your response to Request 23 is anything other than an unqualified admission, IDENTIFY each person with knowledge supportive of your response.

**RESPONSE TO INTERROGATORY 86**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has

1 already answered at least three hundred and twenty three (323) interrogatories propounded by  
2 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.  
3 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
4 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
5 confer as necessary.

6 **REQUEST 24**

7 Admit that, during the CLASS PERIOD, you did not pay sales associates in your San  
8 Francisco store more than 1½ times the applicable minimum wage within the meaning of IWC Wage  
9 Order 7-2001, §3(D).

10 **RESPONSE TO REQUEST 24**

11 Polo specifically objects to the request on the grounds that it is vague and ambiguous as to the  
12 phrase “did not pay sales associates in your San Francisco store more than 1½ times the applicable  
13 minimum wage”. Polo further specifically objects to the extent this request requires a legal  
14 conclusion. Subject to and without waiving the foregoing general and specific objections, and to the  
15 extent that Polo understands the request, Polo denies the request.

16 **INTERROGATORY 87**

17 If your response to Request 24 is anything other than an unqualified admission, state all facts  
18 on which your response is based.

19 **RESPONSE TO INTERROGATORY 87**

20 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number  
21 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has  
22 already answered at least three hundred and twenty three (323) interrogatories propounded by  
23 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.  
24 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
25 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
26 confer as necessary.

**INTERROGATORY 88**

If your response to Request 24 is anything other than an unqualified admission, SPECIFY each DOCUMENT supporting your response.

**RESPONSE TO INTERROGATORY 88**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 89**

If your response to Request 24 is anything other than an unqualified admission, IDENTIFY each person with knowledge supportive of your response.

**RESPONSE TO INTERROGATORY 89**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**REQUEST 25**

Admit that you performed no RECONCILIATION with respect to California sales associates until 2007.

**RESPONSE TO REQUEST 25**

Polo specifically objects to the request on the grounds that it is vague and ambiguous as to the phrase "performed no RECONCILIATION". Subject to and without waiving the foregoing general

1 and specific objections, and to the extent that Polo understands the request, Polo admits the request.

2 **INTERROGATORY 90**

3 If your response to Request 25 is anything other than an unqualified admission, state all facts  
4 on which your response is based.

5 **RESPONSE TO INTERROGATORY 90**

6 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number  
7 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has  
8 already answered at least three hundred and twenty three (323) interrogatories propounded by  
9 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.  
10 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
11 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
12 confer as necessary.

13 **INTERROGATORY 91**

14 If your response to Request 25 is anything other than an unqualified admission, SPECIFY  
15 each DOCUMENT supporting your response.

16 **RESPONSE TO INTERROGATORY 91**

17 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number  
18 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has  
19 already answered at least three hundred and twenty three (323) interrogatories propounded by  
20 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.  
21 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
22 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
23 confer as necessary.

24 **INTERROGATORY 92**

25 If your response to Request 25 is anything other than an unqualified admission, IDENTIFY  
26 each person with knowledge supportive of your response.

27  
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**RESPONSE TO INTERROGATORY 92**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 93**

Describe in detail how you performed the RECONCILIATION applicable to California sales associates in 2007.

**RESPONSE TO INTERROGATORY 93**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 94**

Describe in detail how, if at all, in 2007, you performed the RECONCILIATION applicable to California EMPLOYEES whose tenure with you was less than a year.

**RESPONSE TO INTERROGATORY 94**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly

1 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
2 confer as necessary.

3 **REQUEST 26**

4 Admit that, between March 20, 2002 and the point at which you performed a  
5 RECONCILIATION in approximately August of 2007, you took no measures to assess whether sales  
6 associates in your California full-price stores treated as exempt pursuant to IWC Wage Order 7-2001,  
7 §3(D), actually met the standards set forth therein.

8 **RESPONSE TO REQUEST 26**

9 Polo specifically objects to the request on the grounds that it is vague and ambiguous as to the  
10 phrase "the point at which you performed a RECONCILIATION" and "took no measures to assess".  
11 Defendant further specifically objects on the grounds that the request seeks a legal conclusion.  
12 Subject to and without waiving the foregoing general and special objections, Defendant denies the  
13 request.

14 **INTERROGATORY 95**

15 If your response to Request 26 is anything other than an unqualified admission, state all facts  
16 on which your response is based.

17 **RESPONSE TO INTERROGATORY 95**

18 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number  
19 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has  
20 already answered at least three hundred and twenty three (323) interrogatories propounded by  
21 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.  
22 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
23 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
24 confer as necessary.

25 **INTERROGATORY 96**

26 If your response to Request 26 is anything other than an unqualified admission, SPECIFY  
27 each DOCUMENT supporting your response.  
28

**RESPONSE TO INTERROGATORY 96**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 97**

If your response to Request 26 is anything other than an unqualified admission, IDENTIFY each person with knowledge supportive of your response.

**RESPONSE TO INTERROGATORY 97**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 98**

IDENTIFY each sales associate who worked in a full-price store in California during the CLASS PERIOD to whom the provisions of subsections (A), (B), and (C) of IWC Wage Order 7-2001 did not apply because his or her earnings exceeded "one and one-half (1½) times the minimum wage" and "more than half of that employee's compensation represent[ed] commissions," within the meaning of IWC Wage Order 7-2001, §3(D).

**RESPONSE TO INTERROGATORY 98**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has

1 already answered at least three hundred and twenty three (323) interrogatories propounded by  
2 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.  
3 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
4 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
5 confer as necessary.

6 **INTERROGATORY 99**

7 IDENTIFY each California sales associate whose commission-based earnings were debited  
8 pursuant to your ARREARS PRACTICES.

9 **RESPONSE TO INTERROGATORY 99**

10 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number  
11 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has  
12 already answered at least three hundred and twenty three (323) interrogatories propounded by  
13 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.  
14 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
15 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
16 confer as necessary.

17 **REQUEST 27**

18 Admit that none of the California sales associates whose commission-based earnings were  
19 debited pursuant to your ARREARS PRACTICES ever agreed in writing to have their earnings so  
20 debited.

21 **RESPONSE TO REQUEST 27**

22 Polo specifically objects to the request on the grounds that it is not relevant to any claim or  
23 defense and is not likely to lead to any admissible evidence, and on the grounds that it is vague,  
24 ambiguous and unintelligible to the phrase "commission-based earnings were debited" and "ever  
25 agreed in writing to have their earnings so debited". Based on the foregoing, Defendant lacks  
26 sufficient information to respond to this request and on that basis Defendant denies the request.

**INTERROGATORY 100**

If your response to Request 27 is anything other than an unqualified admission, state all facts on which your response is based.

**RESPONSE TO INTERROGATORY 100**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 101**

If your response to Request 27 is anything other than an unqualified admission, SPECIFY each DOCUMENT supporting your response.

**RESPONSE TO INTERROGATORY 101**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 102**

If your response to Request 27 is anything other than an unqualified admission, IDENTIFY each person with knowledge supportive of your response.

**RESPONSE TO INTERROGATORY 102**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has



1 already answered at least three hundred and twenty three (323) interrogatories propounded by  
2 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.  
3 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
4 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
5 confer as necessary.

6 **INTERROGATORY 103**

7 Explain in detail the relationships between and among Polo Ralph Lauren Corporation, Polo  
8 Retail, LLC, and Fashions Outlet of America, Inc., especially as those relationships apply to your  
9 stores in California.

10 **RESPONSE TO INTERROGATORY 103**

11 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number  
12 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has  
13 already answered at least three hundred and twenty three (323) interrogatories propounded by  
14 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.  
15 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
16 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
17 confer as necessary.

18 **INTERROGATORY 104**

19 State the total number of your former sales associates who worked for you in California for  
20 any length of time during the CLASS PERIOD.

21 **RESPONSE TO INTERROGATORY 104**

22 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number  
23 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has  
24 already answered at least three hundred and twenty three (323) interrogatories propounded by  
25 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.  
26 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
27 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
28 confer as necessary.

1 **INTERROGATORY 105**

2 State the total number of your former cashiers who worked for you in California for any  
3 length of time during the CLASS PERIOD.

4 **RESPONSE TO INTERROGATORY 105**

5 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number  
6 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has  
7 already answered at least three hundred and twenty three (323) interrogatories propounded by  
8 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.  
9 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
10 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
11 confer as necessary.

12 **INTERROGATORY 106**

13 State the total number of your customer service representatives who worked for you in  
14 California for any length of time during the CLASS PERIOD.

15 **RESPONSE TO INTERROGATORY 106**

16 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number  
17 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has  
18 already answered at least three hundred and twenty three (323) interrogatories propounded by  
19 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.  
20 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
21 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
22 confer as necessary.

23 **INTERROGATORY 107**

24 State the average daily amount of unpaid WAITING TIME experienced by CLASS  
25 MEMBERS in your Rodeo Drive store in Beverly Hills, California during each of the years from  
26 2002 through the present.

27  
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**RESPONSE TO INTERROGATORY 107**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 108**

Describe in detail how you calculated your response to the prior interrogatory, including all assumptions you relied upon.

**RESPONSE TO INTERROGATORY 108**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 109**

State the average daily amount of unpaid WAITING TIME experienced by CLASS MEMBERS in your Burlingame Avenue store in Burlingame, California during each of the years from 2002 through the present.

**RESPONSE TO INTERROGATORY 109**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.

1 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
2 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
3 confer as necessary.

4 **INTERROGATORY 110**

5 Describe in detail how you calculated your response to the prior interrogatory, including all  
6 assumptions you relied upon.

7 **RESPONSE TO INTERROGATORY 110**

8 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number  
9 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has  
10 already answered at least three hundred and twenty three (323) interrogatories propounded by  
11 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.  
12 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
13 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
14 confer as necessary.

15 **INTERROGATORY 111**

16 State the average daily amount of unpaid WAITING TIME experienced by CLASS  
17 MEMBERS in your South Coast Plaza store in Costa Mesa, California during each of the years from  
18 2002 through the present.

19 **RESPONSE TO INTERROGATORY 111**

20 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number  
21 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has  
22 already answered at least three hundred and twenty three (323) interrogatories propounded by  
23 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.  
24 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
25 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
26 confer as necessary.

1 **INTERROGATORY 112**

2 Describe in detail how you calculated your response to the prior interrogatory, including all  
3 assumptions you relied upon.

4 **RESPONSE TO INTERROGATORY 112**

5 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number  
6 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has  
7 already answered at least three hundred and twenty three (323) interrogatories propounded by  
8 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.  
9 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
10 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
11 confer as necessary.

12 **INTERROGATORY 113**

13 State the average daily amount of unpaid WAITING TIME experienced by CLASS  
14 MEMBERS in each of your Malibu, California stores during each of the years from 2002 through the  
15 present.

16 **RESPONSE TO INTERROGATORY 113**

17 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number  
18 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has  
19 already answered at least three hundred and twenty three (323) interrogatories propounded by  
20 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.  
21 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
22 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
23 confer as necessary.

24 **INTERROGATORY 114**

25 Describe in detail how you calculated your response to the prior interrogatory, including all  
26 assumptions you relied upon.

27  
28



**RESPONSE TO INTERROGATORY 114**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 115**

State the average daily amount of unpaid WAITING TIME experienced by CLASS MEMBERS in your Palo Alto, California store (Store No. 409) during each of the years from 2002 through the present.

**RESPONSE TO INTERROGATORY 115**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 116**

Describe in detail how you calculated your response to the prior interrogatory, including all assumptions you relied upon.

**RESPONSE TO INTERROGATORY 116**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.

Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

#### **INTERROGATORY 117**

State the average daily amount of unpaid WAITING TIME experienced by CLASS MEMBERS in your Union Street Rugby store in San Francisco during each of the years from 2002 through the present.

#### **RESPONSE TO INTERROGATORY 117**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

#### **INTERROGATORY 118**

Describe in detail how you calculated your response to the prior interrogatory, including all assumptions you relied upon.

#### **RESPONSE TO INTERROGATORY 118**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 119**

State the average daily amount of unpaid WAITING TIME experienced by CLASS MEMBERS in your Palo Alto, California store (Store No. 810), during each of the years from 2002 through the present.

**RESPONSE TO INTERROGATORY 119**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 120**

Describe in detail how you calculated your response to the prior interrogatory, including all assumptions you relied upon.

**RESPONSE TO INTERROGATORY 120**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 121**

State the average daily amount of unpaid WAITING TIME experienced by CLASS MEMBERS in your Palm Desert, California store during each of the years from 2002 through the present.

**RESPONSE TO INTERROGATORY 121**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 122**

Describe in detail how you calculated your response to the prior interrogatory, including all assumptions you relied upon.

**RESPONSE TO INTERROGATORY 122**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 123**

State the average daily amount of unpaid WAITING TIME experienced by CLASS MEMBERS in your Post Street store in San Francisco, California during each of the years from 2002 through the present.

**RESPONSE TO INTERROGATORY 123**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.

1 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
2 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
3 confer as necessary.

4 **INTERROGATORY 124**

5 Describe in detail how you calculated your response to the prior interrogatory, including all  
6 assumptions you relied upon.

7 **RESPONSE TO INTERROGATORY 124**

8 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number  
9 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has  
10 already answered at least three hundred and twenty three (323) interrogatories propounded by  
11 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.  
12 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
13 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
14 confer as necessary.

15 **INTERROGATORY 125**

16 State the average daily amount of unpaid WAITING TIME experienced by CLASS  
17 MEMBERS in your Polo Ralph Lauren Factory Store in Alpine, California during each of the years  
18 from 2002 through the present.

19 **RESPONSE TO INTERROGATORY 125**

20 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number  
21 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has  
22 already answered at least three hundred and twenty three (323) interrogatories propounded by  
23 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.  
24 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
25 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
26 confer as necessary.



**INTERROGATORY 126**

Describe in detail how you calculated your response to the prior interrogatory, including all assumptions you relied upon.

**RESPONSE TO INTERROGATORY 126**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 127**

State the average daily amount of unpaid WAITING TIME experienced by CLASS MEMBERS in your Polo Ralph Lauren Factory Store in Anderson, California during each of the years from 2002 through the present.

**RESPONSE TO INTERROGATORY 127**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 128**

Describe in detail how you calculated your response to the prior interrogatory, including all assumptions you relied upon.

**RESPONSE TO INTERROGATORY 128**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 129**

State the average daily amount of unpaid WAITING TIME experienced by CLASS MEMBERS in your Polo Ralph Lauren Factory Store in Barstow, California during each of the years from 2002 through the present.

**RESPONSE TO INTERROGATORY 129**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 130**

Describe in detail how you calculated your response to the prior interrogatory, including all assumptions you relied upon.

**RESPONSE TO INTERROGATORY 130**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.

1 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
2 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
3 confer as necessary.

4 **INTERROGATORY 131**

5 State the average daily amount of unpaid WAITING TIME experienced by CLASS  
6 MEMBERS in each of your Cabazon, California stores during each of the years from 2002 through  
7 the present.

8 **RESPONSE TO INTERROGATORY 131**

9 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number  
10 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has  
11 already answered at least three hundred and twenty three (323) interrogatories propounded by  
12 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.  
13 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
14 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
15 confer as necessary.

16 **INTERROGATORY 132**

17 Describe in detail how you calculated your response to the prior interrogatory, including all  
18 assumptions you relied upon.

19 **RESPONSE TO INTERROGATORY 132**

20 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number  
21 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has  
22 already answered at least three hundred and twenty three (323) interrogatories propounded by  
23 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.  
24 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
25 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
26 confer as necessary.

**INTERROGATORY 133**

State the average daily amount of unpaid WAITING TIME experienced by CLASS MEMBERS in your Polo Ralph Lauren Factory Store in Camarillo, California during each of the years from 2002 through the present.

**RESPONSE TO INTERROGATORY 133**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 134**

Describe in detail how you calculated your response to the prior interrogatory, including all assumptions you relied upon.

**RESPONSE TO INTERROGATORY 134**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 135**

State the average daily amount of unpaid WAITING TIME experienced by CLASS MEMBERS in your Polo Ralph Lauren Factory Store in Carlsbad, California, during each of the years from 2002 through the present.

**RESPONSE TO INTERROGATORY 135**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 136**

Describe in detail how you calculated your response to the prior interrogatory, including all assumptions you relied upon.

**RESPONSE TO INTERROGATORY 136**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 137**

State the average daily amount of unpaid WAITING TIME experienced by CLASS MEMBERS in your Polo Ralph Lauren Factory Store in Gilroy, California during each of the years from 2002 through the present.

**RESPONSE TO INTERROGATORY 137**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.



1 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
2 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
3 confer as necessary.

4 **INTERROGATORY 138**

5 Describe in detail how you calculated your response to the prior interrogatory, including all  
6 assumptions you relied upon.

7 **RESPONSE TO INTERROGATORY 138**

8 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number  
9 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has  
10 already answered at least three hundred and twenty three (323) interrogatories propounded by  
11 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.  
12 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
13 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
14 confer as necessary.

15 **INTERROGATORY 139**

16 State the average daily amount of unpaid WAITING TIME experienced by CLASS  
17 MEMBERS in your Polo Ralph Lauren Factory Store in Mammoth Lakes, California during each of  
18 the years from 2002 through the present.

19 **RESPONSE TO INTERROGATORY 139**

20 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number  
21 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has  
22 already answered at least three hundred and twenty three (323) interrogatories propounded by  
23 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.  
24 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
25 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
26 confer as necessary.

1 **INTERROGATORY 140**

2 Describe in detail how you calculated your response to the prior interrogatory, including all  
3 assumptions you relied upon.

4 **RESPONSE TO INTERROGATORY 140**

5 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number  
6 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has  
7 already answered at least three hundred and twenty three (323) interrogatories propounded by  
8 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.  
9 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
10 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
11 confer as necessary.

12 **INTERROGATORY 141**

13 State the average daily amount of unpaid WAITING TIME experienced by CLASS  
14 MEMBERS in your Polo Ralph Lauren Factory Store in Ontario, California during each of the years  
15 from 2002 through the present.

16 **RESPONSE TO INTERROGATORY 141**

17 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number  
18 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has  
19 already answered at least three hundred and twenty three (323) interrogatories propounded by  
20 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.  
21 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
22 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
23 confer as necessary.

24 **INTERROGATORY 142**

25 Describe in detail how you calculated your response to the prior interrogatory, including all  
26 assumptions you relied upon.

27  
28

**RESPONSE TO INTERROGATORY 142**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 143**

State the average daily amount of unpaid WAITING TIME experienced by CLASS MEMBERS in your Polo Ralph Lauren Factory Store in Pismo Beach, California, during each of the years from 2002 through the present.

**RESPONSE TO INTERROGATORY 143**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 144**

Describe in detail how you calculated your response to the prior interrogatory, including all assumptions you relied upon.

**RESPONSE TO INTERROGATORY 144**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.

1 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
2 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
3 confer as necessary.

4 **INTERROGATORY 145**

5 State the average daily amount of unpaid WAITING TIME experienced by CLASS  
6 MEMBERS in your Polo Ralph Lauren Factory Store in San Diego, California during each of the  
7 years from 2002 through the present.

8 **RESPONSE TO INTERROGATORY 145**

9 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number  
10 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has  
11 already answered at least three hundred and twenty three (323) interrogatories propounded by  
12 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.  
13 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
14 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
15 confer as necessary.

16 **INTERROGATORY 146**

17 Describe in detail how you calculated your response to the prior interrogatory, including all  
18 assumptions you relied upon.

19 **RESPONSE TO INTERROGATORY 146**

20 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number  
21 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has  
22 already answered at least three hundred and twenty three (323) interrogatories propounded by  
23 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.  
24 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
25 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
26 confer as necessary.

**INTERROGATORY 147**

State the average daily amount of unpaid WAITING TIME experienced by CLASS MEMBERS in your Polo Ralph Lauren Factory Store in Tulare, California during each of the years from 2002 through the present.

**RESPONSE TO INTERROGATORY 147**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 148**

Describe in detail how you calculated your response to the prior interrogatory, including all assumptions you relied upon.

**RESPONSE TO INTERROGATORY 148**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 149**

State the average daily amount of unpaid WAITING TIME experienced by CLASS MEMBERS in your Polo Ralph Lauren Factory Store in Vacaville, California during each of the years from 2002 through the present.



**RESPONSE TO INTERROGATORY 149**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 150**

Describe in detail how you calculated your response to the prior interrogatory, including all assumptions you relied upon.

**RESPONSE TO INTERROGATORY 150**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 151**

State the average daily amount of unpaid WAITING TIME experienced by CLASS MEMBERS in your Polo Ralph Lauren Children's Factory Store in Gilroy, California during each of the years from 2002 through the present.

**RESPONSE TO INTERROGATORY 151**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.

1 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
2 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
3 confer as necessary.

4 **INTERROGATORY 152**

5 Describe in detail how you calculated your response to the prior interrogatory, including all  
6 assumptions you relied upon.

7 **RESPONSE TO INTERROGATORY 152**

8 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number  
9 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has  
10 already answered at least three hundred and twenty three (323) interrogatories propounded by  
11 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.

12 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
13 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
14 confer as necessary.

15 **INTERROGATORY 153**

16 State the average daily amount of unpaid WAITING TIME experienced by CLASS  
17 MEMBERS in your Polo Jeans Co. Factory Store in Camarillo, California, during each of the years  
18 from 2002 through the present.

19 **RESPONSE TO INTERROGATORY 153**

20 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number  
21 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has  
22 already answered at least three hundred and twenty three (323) interrogatories propounded by  
23 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.  
24 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
25 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
26 confer as necessary.

1 **INTERROGATORY 154**

2 Describe in detail how you calculated your response to the prior interrogatory, including all  
3 assumptions you relied upon.

4 **RESPONSE TO INTERROGATORY 154**

5 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number  
6 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has  
7 already answered at least three hundred and twenty three (323) interrogatories propounded by  
8 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.  
9 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
10 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
11 confer as necessary.

12 **INTERROGATORY 155**

13 State the average daily amount of unpaid WAITING TIME experienced by CLASS  
14 MEMBERS in your Polo Jeans Co. Factory Store in Gilroy, California during each of the years from  
15 2002 through the present.

16 **RESPONSE TO INTERROGATORY 155**

17 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number  
18 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has  
19 already answered at least three hundred and twenty three (323) interrogatories propounded by  
20 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.  
21 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
22 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
23 confer as necessary.

24 **INTERROGATORY 156**

25 Describe in detail how you calculated your response to the prior interrogatory, including all  
26 assumptions you relied upon.

27  
28

**RESPONSE TO INTERROGATORY 156**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 157**

State the average daily amount of unpaid WAITING TIME experienced by CLASS MEMBERS in your Polo Jeans Co. Factory Store in San Diego, California during each of the years from 2002 through the present.

**RESPONSE TO INTERROGATORY 157**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and five (352) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

**INTERROGATORY 158**

Describe in detail how you calculated your response to the prior interrogatory, including all assumptions you relied upon.

**RESPONSE TO INTERROGATORY 158**

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly

1 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
 2 confer as necessary.

3 **INTERROGATORY 159**

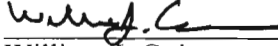
4 Identify (by name, address and store number) each store at which any of your EMPLOYEES  
 5 has worked for you in California at any time since May 20, 2002.

6 **RESPONSE TO INTERROGATORY 159**

7 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number  
 8 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has  
 9 already answered at least three hundred and twenty three (323) interrogatories propounded by  
 10 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.  
 11 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly  
 12 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and  
 13 confer as necessary.

14  
 15 Dated: August 28, 2008

GREENBERG TRAURIG, LLP

17 By:   
 18 William J. Goines  
 19 Jeremy A. Meier  
 Alisha M. Louie

20 Attorneys for Defendants Polo Ralph Lauren  
 21 Corporation; Polo Retail, LLC; Polo Ralph Lauren  
 22 Corporation, doing business in California as Polo  
 23 Retail Corporation; and Fashions Outlet of  
 24 America, Inc.  
 25  
 26  
 27  
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